



Seyfarth Shaw LLP

620 Eighth Avenue

New York, New York 10018

T (212) 218-5500

F (212) 218-5526

cstieber@seyfarth.com

T (212) 218-3382

www.seyfarth.com

*Time to answer
extended to Feb 28.
Conference adjourned
from February 21 to
March 17, 2020 at 12:00 PM*

SO ORDERED

1-17-20

January 16, 2020

VIA ECF

Hon. P. Kevin Castel
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street, Courtroom 11D
New York, NY 10007

Re: Michael Page International Inc. v. Anthony Giaimo d/b/a Capstone Search Partners LLC, Case No.: 1:19-cv-10981-PKC (S.D.N.Y.)

Dear Judge Castel:

This firm represents Plaintiff Michael Page International Inc. ("Plaintiff") in the above-referenced action. We write jointly with consent of Defendant Anthony Giaimo d/b/a Capstone Search Partners LLC ("Defendant"), to respectfully request an extension of the time for Defendant to answer, move, or otherwise respond to the Complaint, up to and including February 28, 2020. This is the parties' first request for an extension of this deadline.

By way of background, Defendant was served with a copy of the Complaint on January 7, 2020, and his present deadline to file a responsive pleading is January 28, 2020 (ECF No. 9). The parties are currently engaged in settlement discussions and request an extension of the responsive pleading deadline to February 28, 2020 to continue those discussions.

The granting of this extension request will not impact any other scheduled deadlines, and is not intended to cause undue delay, although we do note that the initial conference is scheduled for February 21, 2020. We thank the Court for its time and attention to this matter, and for its consideration of this application.



Hon. P. Kevin Castel
January 16, 2020
Page 2

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Courtney Stieber

Courtney Stieber